

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SERGIO BONILLA, on behalf of himself and all)	
others similarly situated,)	
)	Case No. 1:20-cv-07390
Plaintiff,)	
)	Hon. Judge Virginia M. Kendall
v.)	
)	
ANCESTRY.COM OPERATIONS INC.,)	
a Virginia Corporation; ANCESTRY.COM INC.,)	
a Delaware Corporation; and ANCESTRY.COM)	
LLC, a Delaware Limited Liability Company,)	
)	
Defendants.)	
)	

JOINT MOTION FOR EXTENSION OF FACT DISCOVERY DEADLINE

Plaintiff Sergio Bonilla and Defendants Ancestry.com Operations Inc., Ancestry.com Inc., and Ancestry.com LLC (collectively, “Ancestry”), by and through their undersigned counsel, hereby jointly move to extend the deadline for completing fact discovery in this matter, which is currently set for July 22, 2022, *see* Doc. 58. In support of this motion, the parties state as follows:

1. Fact discovery opened in this case on December 7, 2021, following the Court’s denial of Ancestry’s motion to dismiss. *See* Doc. Nos. 57, 58.
2. Plaintiff served a first set of discovery requests on Ancestry on January 3, 2022, and Ancestry provided written responses and objections to those requests on February 16, 2022.
3. On February 10, 2022, Ancestry moved for summary judgment, arguing that Plaintiff’s claims are time-barred. Doc. Nos. 60, 61. Plaintiff opposed that motion. Doc. No. 69.
4. Plaintiffs subsequently served a second set of discovery on Ancestry on February 18, 2022, and Ancestry provided written responses and objections to those requests on March 21, 2022.
5. After meeting and conferring regarding Ancestry’s responses and objections to both sets of Plaintiff’s discovery requests, Plaintiff filed a motion to compel the production of

documents and information responsive to those requests, Ancestry opposed that motion and also filed a motion for a protective order, which Plaintiff opposed. Doc Nos. 75, 77, 78, 84, 85. Those motions remain pending before the Court.

6. As a result of the pending discovery dispute, the outcome of which will affect how and when discovery moves forward, the Parties jointly request that the Court extend the fact discovery deadline by four months to November 22, 2022. This is the Parties' first request to extend the fact discovery deadline.

7. This request is sought in good faith and not for any improper purpose or for the purpose of delay.

WHEREFORE, the Parties respectfully request that the Court grant this joint motion to extend the fact discovery deadline to November 22, 2022.

Dated: June 1, 2022

Respectfully submitted,

/s/ Raina C. Borrelli

Raina C. Borrelli
Samuel J. Strauss
TURKE & STRAUSS LLP
613 Williamson St., Suite 201
Madison, WI 53703
Telephone: (608) 237-1775
Facsimile: (608) 509-4423
raina@turkestrauss.com
sam@turkestrauss.com

/s/ Shon Morgan

Shon Morgan
John Wall Baumann
QUINN EMANUEL URQUHART &
SULLIVAN LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
jackbaumann@quinnemanuel.com
shonmorgan@quinnemanuel.com

Michael F. Ram, *Admitted Pro Hac Vice*
Marie N. Appel, *Admitted Pro Hac Vice*
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
711 Van Ness Avenue, Suite 500
San Francisco, CA 94102
Telephone: (415) 358-6913
Facsimile: (415) 358-6923
mram@forthepeople.com
mappel@forthepeople.com

Daniel R. Lombard
QUINN EMANUEL URQUHART &
SULLIVAN LLP
191 North Wacker Drive, #2700
Chicago, IL 60606
Telephone: (312) 705-7400
daniellombard@quinnemanuel.com

Benjamin R. Osborn, *Admitted Pro Hac Vice*
102 Bergen Street

Christina Aide Henriquez
QUINN EMANUEL URQUHART &
SULLIVAN LLP
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065

Brooklyn, NY 11201
Telephone: (347) 645-0464
ben@benosbornlaw.com

Telephone: (650) 801-5000
cristinahenriquez@quinnemanuel.com

Shannon M. McNulty
CLIFFORD LAW OFFICES, P.C.
120 N. LaSalle Street, 31st Floor
Chicago, Illinois 60602
Telephone: (312) 899-9090
Facsimile: (312) 251-1160
SMM@cliffordlaw.com

CERTIFICATE OF SERVICE

I, Raina C. Borrelli, hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED this 1st day of June, 2022.

TURKE & STRAUSS LLP

By: /s/ Raina C. Borrelli
Raina C. Borrelli
Email: raina@turkestrauss.com
TURKE & STRAUSS LLP
613 Williamson St., Suite 201
Madison, WI 53703
Telephone: (608) 237-1775
Facsimile: (608) 509-4423